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March 29, 2019

BY ECF

The Honorable Dora L. Irizarry
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Freeman v. HSBC Holdings plc*, 14-cv-6601-DLI-CLP (“*Freeman*”)

Dear Chief Judge Irizarry:

On behalf of the Moving Defendants,¹ I write to inform the Court of the enclosed decision issued yesterday granting defendants’ motion to dismiss the complaint in *O’Sullivan v. Deutsche Bank AG*, No. 17 Civ. 8709 (LTS) (GWG) (“*O’Sullivan*”). The Moving Defendants have previously written to this Court regarding *O’Sullivan*, in which the complaint is almost identical in substance to the complaint in *Freeman*. Both cases involve substantially similar claims premised on sanctions violations by most of the same defendants based on essentially the same factual allegations and theories of alleged liability for injuries sustained in attacks allegedly perpetrated by the same groups during the same time period on American service personnel in Iraq.

In yesterday’s decision, the *O’Sullivan* court dismissed all claims for primary liability and secondary liability under the ATA including JASTA.

For the reasons set forth in the *O’Sullivan* decision and in the Moving Defendants’ previous briefing, the motion to dismiss the complaint in *Freeman* should be granted.

¹ The “Moving Defendants” are HSBC Holdings PLC, HSBC Bank PLC, HSBC Bank Middle East Limited, HSBC Bank USA, N.A., Barclays Bank PLC, Standard Chartered Bank, The Royal Bank of Scotland N.V., Credit Suisse AG, and Commerzbank AG.

Respectfully submitted,



Jonathan Blackman

Enclosure

cc: Counsel of Record (by ECF)